### OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
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June 9, 2017

Ms. sharada Maligireddy Bureau of Water Pollution Control Nevada Division of Environmental Protection 901 South Stewart Street, Suite 4001 Carson City, Nevada 89701

RE: 100 % Design Submittal – SNWA Weir Treatment System Nevada Environmental Response Trust Henderson, Nevada

Dear Ms. Maligireddy:

The Nevada Environmental Response Trust (NERT) is pleased to present the 100% Design Submittal – SNWA Weir Treatment System for Nevada Division of Environmental Protection (NDEP) review. Inclusive to this submittal is the following:

- Report of Geotechnical Investigation, Central Treatment Plant, dated February 14, 2017. This document
  has not been modified since originally submitted to NDEP on March 7, 2017 but has been included for
  reference purposes.
- Report of Geotechnical Investigation, Pump Stations, dated February 14, 2017. This document has not been modified since originally submitted to NDEP on March 7, 2017 but has been included for reference purposes.
- Technical Memorandum, Control Narrative, dated June 6, 2017. A previous version of this document was submitted to NDEP on March 7, 2017 but has been updated to remain consistent with the 100% design and comments received from NDEP. The previous version of this document can be discarded.
- Technical Memorandum, Key Features of Treatment System, dated June 6, 2017. A previous version of this document was submitted to NDEP on March 7, 2017 but has been updated to remain consistent with the 100% design and comments received from NDEP. The previous version of this document can be discarded.
- SNWA Weir Treatment System 100% Design drawings, stamped and dated May 22, 2017. The previously submitted 75% design documentation can be discarded.
- SNWA Weir Treatment System Technical Specifications, Revision 1, dated May 22, 2017. Revision 0, previously submitted to NDEP, can be discarded.

The 100% design and associated documents in this submittal generally reflect the following modifications made as the design advanced subsequent to the submittal of the 75% package:

- A 5<sup>th</sup> influent tank was added at the Sunrise Mountain Pump Station and the inlet pipe size to the Sunrise Mountain Pump Station was increased from 18-inches to 24-inches to accommodate the water delivery pressure from SNWA.
- A storage tank for fire protection water and hydrant required by the City of Henderson was added at the Central Treatment Plant.
- Minor grading changes were made to accommodate the final facility configurations.

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• Process equipment numbering and design details were added to complete the 100% design.

In addition, this submittal addresses your comments provided in NDEP's May 3, 2017 correspondence. NERT's response to each of your comments is provide below.

1. Comment: "Process Chemicals Characterization: Include/elaborate the Ion Exchange System section identifying the chemicals involved (both reactants and products of the Ion Exchange reaction) and the fate of each of these chemicals through the end of the treatment system."

Response: No chemicals will be added to the Ion Exchange system influent and no products other than exchanged ions will be present in the Ion Exchange effluent as described in Section 2.5 of the Key Features of the Treatment System Technical Memorandum. A small amount of polymer may be introduced before the mixed media filters to improve solids removal and is described in Section 2.6 of the Key Features of the Treatment System Technical Memorandum.

2. Comment: "Include the Safety Data Sheets for the chemicals/resins involved in the IX system."

Response: Safety Data Sheets for the resin and polymer have been included as Appendix A of the Key Features of the Treatment System Technical Memorandum.

3. Comment: "The estimated quantities of disposable material (GAC & Resin) to be used per batch/unit and the estimated frequency of change/replacement of each of these mediums."

Response: The Key Features of the Treatment System Technical Memorandum has been updated to include Section 2.5 – Ion Exchange Resin Characteristics and Management. This section describes in detail the characteristics of the resin and the strategy for disposing of it. No other disposable materials, including GAC, will be utilized by the system.

4. Comment: "Include a section explaining expected pollutant/contaminant make-up and plans to handle the waste stream from the Hydrocyclones."

Response: Section 2.6 – Cyclone Waste Management of the Key Features of the Treatment System Technical Memorandum has been added to the revised document and includes this information.

5. Comment: "Include details of how the waste stream from the Hydrocyclones, which will not enter the effluent pipe, is going to be handled. If & when no additional contaminants are present, are there any beneficial uses, within the Wash/project area, identified instead of hauling off of the site?"

Response: Section 2.6 – Cyclone Waste Management of the Key Features of the Treatment System Technical Memorandum has been added and provides the requested details. With respect to the use of the solids for beneficial uses, the land on which the plant is constructed is not owned by the Trust and will need to be restored to substantially the same conditions which existed prior to the performance of the work, so on-site management of the solids was not considered.

6. Comment: "Please also include the schedule/estimated project construction/installation/set up timelines."

Response: The current project schedule is as follows:

- Contractor mobilization mid-June 2017
- Earthworks begin mid-June 2017
- Submittal of Plant Operations and Maintenance Manual September 2017
- Substantial Completion (Plant ready for commissioning) October 2017
- Final Completion (Plant ready to accept water) November 2017

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As we have discussed, the lead beneficiary of the Trust is the State of Nevada through the BISC. The BISC has made this project a priority for the Trust and we desire to begin construction as soon as possible. Accordingly, an expedited review of this 100% design submittal would be greatly appreciated.

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4309 or at steve.clough@nert-trust.com.

Office of the Nevada Environmental Response Trust

Stephen R. Clough Stephen R. Clough, P.G., CEM

Remediation Director

CEM Certification Number: 2399, exp. 3/24/19

### Cc (via NERT Sharefile Distribution):

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Carlton Parker, NDEP Bureau of Industrial Site Cleanup

Weiquan Dong, NDEP Bureau of Industrial Site Cleanup

Christa Smaling, NDEP Bureau of Industrial Site Cleanup

Frederick Perdomo, Nevada Attorney General's Office

Alison Fong, U.S. Environmental Protection Agency, Region 9

Mark Duffy, U.S. Environmental Protection Agency, Region 9

Jay Steinberg, as President of the Nevada Environmental Response Trust Trustee and not individually

Andrew Steinberg, as Vice President of the Nevada Environmental Response Trust Trustee and not individually

Tanya C. O'Neill, Foley and Lardner, LLP

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